

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

<div>In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> Debtors.¹</div>	<div>PROMESA Title III Case No. 17 BK 3283-LTS (Jointly Administered)</div>
<div>In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO as representative of PUERTO RICO ELECTRIC POWER AUTHORITY, Debtor.</div>	<div>PROMESA Title III Case No. 17 BK 4780-LTS</div>

**SREAEE’S PRELIMINARY FACT WITNESS LIST AND EXPERT WITNESS
DISCLOSURES**

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¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.)

TO THE HONORABLE COURT

COMES NOW Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica (“SREAEE”) and, through the undersigned attorneys, submit these Disclosures under Federal Rule of Civil Procedure 26(a), as made applicable to this action by Rule 7026 of the Federal Rules of Bankruptcy Procedure and Section 310 of PROMESA, as per the Title III Court’s *Amended and Restated Order Establishing, Among Other Things, Procedures and deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* (“Procedural Order”), Case No. 17-04780-LTS, ECF 3305. SREAEE does not waive any rights, privileges, or protections, including but not limited to objections on any grounds to the discovery or use of information disclosed herein, and SREAEE expressly reserves all such rights.

SREAEE’S PRELIMINARY FACT WITNESS LIST

1. José Rivera Rivera, President of Board of Trustees of SREAEE

- a. Physical Address: Edif. Juan Ruiz Vélez Ave. Ponce de León 1110 Santurce, PR
- b. Telephone: (787) 521-4747
- c. Email: miraflares1811@yahoo.com

Subject of the testimony: Mr. José Rivera will discuss the damages that the *Modified Second Amended Title III Plan of Adjustment of the Puerto Rico Electric Power Authority*, filed at Case No. 17-04780-LTS, ECF 3296 (“Plan”), will inflict on SREAEE, PREPA’s labor force, PREPA and its stakeholders. Additionally, he will discuss the Trust Agreement of 1974 and the priority of payment for Current Expenses, which include pension contributions. Moreover, he will testify to the lack of feasibility of the Plan, as well as the discriminatory treatment of SREAEE as a creditor, which affects the fair and equitable standard. *SREAEE reserves all rights to amend this information as a result of discovery and/or any subsequent amendment to the Plan of Adjustment or Disclosure*

Statement for Modified Second Amended Title III Plan of Adjustment of The Puerto Rico Electric Power Authority filed at Case No. 17-04780-LTS, ECF 3297 (“Disclosure Statement”).

SREAEE’S OPENING EXPERT WITNESS DISCLOSURE

1. José Fernández, ASA, MAAA, EA, Consulting Actuary Fase2 C&W, LLC.

- a. Physical Address: 1720 Mars Hill Rd, Suite 120-284 Acworth, GA 30101
- b. Telephone: (678) 983-0903.
- c. Email: JoseF@Fase2consulting.com

General subject of the testimony: Mr. José Fernández will provide expert testimony from an actuarial and financial standpoint about the current state of the Retirement System and how the SREAEE’s pension reform proposal is viable. Moreover, he will testify that this proposal complies with the corresponding regulation. His testimony will be focused on the negative impact of the Plan on SREAEE and its participants, as well as the unreasonableness of the proposed treatment for the Pension Claim and the proposed pension reform. Moreover, Mr. Fernández will testify on the difference of the treatment given to the Pension Claim compared to other similarly situated creditors. *SREAEE reserves all rights to amend this information because of discovery and/or any subsequent amendment to the Plan of Adjustment or Disclosure Statement. Additionally, SREAEE reserves the right to amend the scope of Mr. Fernández’s testimony to include expert rebuttal witness testimony.*

2. Dr. José I. Alameda Lozada, Economist.

- a. Physical Address: Bechara # 411, Villa Sultanita, Mayagüez PR 00680
- b. Telephone: (787) 309-9046.
- c. Email: joseialameda@gmail.com

General subject of the testimony: Dr. José Alameda will provide expert testimony from an economic standpoint supporting the fact that the Plan is not feasible nor in the best interests of

PREPA, its Creditors and Stakeholders, or the Commonwealth. His testimony will be focused on the macroeconomic impact of the Plan, particularly the implementation of the Legacy Charge and its effect on Puerto Rico's economy. Dr. Alameda will demonstrate that the Plan's proposed Legacy Charge will cause a downward economic spiral to Puerto Rico, as it will negatively impact consumers, production, employment, migration, commercial competitiveness, etc. This entails the eventual failure of PREPA's Plan and, consequently, the Commonwealth's failure to meet its debt service obligations pursuant to its own Plan of Adjustment. *SREAEE reserves all rights to amend this information because of discovery and/or any subsequent amendment to the Plan of Adjustment or Disclosure Statement. Additionally, SREAEE reserves the right to amend the scope of Dr. Alameda's testimony to include expert rebuttal witness testimony.*



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